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SECTION PARTNERS MANAGEMENT,
8 LLC

9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 SECTION PARTNERS MANAGEMENT,
13 LLC,

14 Plaintiff,

15 v.

16 EQUITYBEE, INC.; SECFI, INC.; SECFI
SECURITIES, LLC; SERENGETI ASSET
17 MANAGEMENT, LP; AND WOUTER
WITVOET,

18 Defendants.
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Case No. 3:23-cv-05030-VC

**PLAINTIFF'S MOTION FOR ENTRY OF
PROTECTIVE ORDER**

Pursuant to this Court's March 22, 2024 Case Management Conference and Minute Order (D.I. 26), Plaintiff Section Partners Management, LLC hereby submits its proposal for a Protective Order in this case (attached as Exhibit 1). Plaintiff exchanged a copy of the attached Protective Order with opposing counsel on March 29, 2024. That same day counsel for Defendant EquityBee, Inc. responded that Defendant would provide comments. Despite numerous efforts, Plaintiff has been unable to reach Defendant's counsel since that time. *See* Penner Declaration in Support of Plaintiff's Motion for Entry of Protective Order. Plaintiff is unaware whether Defendant may wish to propose edits, or if Defendant has a competing proposal. *Id.*

Plaintiff respectfully requests entry of its proposed Protective Order.

Dated: April 5, 2024

Respectfully submitted,

EVERSHEDS SUTHERLAND (US) LLP

/s/ Scott A. Penner

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this case.

Executed on: April 5, 2024

EVERSHEDS SUTHERLAND (US) LLP

/s/ Scott A. Penner

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